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United States District Court  
STATE AND DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA

V.

JEFFREY LEE DOLSON

CRIMINAL COMPLAINT

Case Number: 10-mj-66(mkk)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 21, 2010, in Beltrami County, in the State and District of Minnesota, defendant(s) previously convicted of an offense punishable by imprisonment for more than one year did possess, in and affecting interstate commerce, a firearm, namely a Glock Model 23, .40 caliber semi-automatic pistol, serial number FBG 681

in violation of Title 18, United States Code, Section(s) 922(g)(1) and 924(a)(2).

I further state that I am a(n) Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me, and subscribed in my presence,

Feb. 24, 2010  
Date

The Honorable Mary Kay Klein  
UNITED STATES MAGISTRATE JUDGE

Name & Title of Judicial Officer



Signature of Complainant  
Rob Mertz  
FBI

Duluth, MN  
City and State

  
Signature of Judicial Officer

SCANNED

MAR 02 2010

U.S. DISTRICT COURT ST. PAUL

1 STATE OF MINNESOTA )  
2 COUNTY OF BELTRAMI ) ss. AFFIDAVIT OF ROBERT L MERTZ  
3 )

4 1. Your affiant, Robert L. Mertz, being duly  
5 sworn, does depose and state as follows:

6 2. I am a Special Agent (SA) of the Federal Bureau  
7 of Investigation (FBI). I have been a Special Agent of the  
8 FBI since March of 2002. The information in this affidavit  
9 has been provided to me by Special Agent Russ Traurig of the  
10 Bureau of Alcohol, Tobacco, Firearms, and Explosives. SA  
11 Traurig has been employed by the Bureau of Alcohol, Tobacco,  
12 Firearms, and Explosives for approximately 12 years. SA  
13 Traurig has investigated violations of Federal Law as a  
14 Special Agent for approximately 20 years and has been  
15 involved in numerous cases related to violations of the  
16 Federal Firearms Laws. These Laws include 18 USC 922 (g) (1)  
17 which states that it is unlawful for a person who has been  
18 convicted of a crime punishable by more than one year to  
19 possess a firearm.

20 3. Red Lake Police Officers William Branchaud and  
21 Jonathan Richards advised on 2/21/10 at 1:20pm, the Red Lake  
22 Police Department dispatch received a phone call from an  
23 unknown individual who indicated that an individual named  
24 David Bowen AKA DJ Bowen had been assaulted at the Jeff  
25 Dolson residence. At 1:33pm, Dispatch received another call  
26 from an individual named Jackie Hobson who indicated Bowen  
27 had been assaulted at the Dolson residence.

28 4. Officer Richards arrived at the Dolson

1 residence at 1:38pm to conduct a health and welfare check.  
2 Richards said that he knocked on the door and announced  
3 police. He heard loud music from inside. He also heard  
4 someone say come in. Richards entered and observed Bowen, an  
5 individual he knows, inside the residence. He also observed  
6 Jeff Dolson, an individual he knows, enter the residence from  
7 the 2nd story deck wearing an empty shoulder holster and in  
8 an apparent intoxicated state. Dolson was hiding his left  
9 hand behind his left leg in a fighting stance. Richards knew  
10 Dolson to be a felon and prohibited from possessing a  
11 firearm. Richards said that Dolson was verbally combative  
12 and yelling and asking why the officer was in the residence.  
13 Richards said that he indicated to Dolson that he was there  
14 only to check on Bowen, whom he saw was ok, and that he would  
15 now leave.

16 5. Upon exiting the driveway and leaving, the  
17 officer observed Dolson at 1:38pm, standing on the deck of  
18 the residence shooting a handgun into the woods, not in the  
19 direction of Officer Richards. Officer Richards left the  
20 area of the residence to allow for backup. Officer Richards  
21 and Officer Branchaud returned a short time later to the  
22 residence where Branchaud observed Dolson outside his  
23 residence with a bottle of beer in his hand. Officer  
24 Branchaud pointed his duty rifle at Dolson and gave Dolson  
25 verbal commands with which Dolson did not comply. Dolson  
26 walked, then ran back toward the residence. Officer  
27 Branchaud caught up with Dolson at the door and made physical  
28 contact with Dolson, causing both of them to tumble into the

1 residence onto the floor. In the scuffle just inside the  
2 residence door with Officer Branchaud on top of him, Dolson  
3 pitched a handgun down the stairs. Dolson was arrested by  
4 Red Lake Police for in part, handling a dangerous weapon,  
5 disorderly conduct and obstructing.

6 6. Red Lake Police conducted a safety sweep of the  
7 residence and noted the handgun (that appeared to be a black  
8 in color Glock) and shell casings inside the residence.  
9 Jeffery Lee Dolson DOB 4/26/80 is known to your affiant as a  
10 felon based on a federal conviction dated 4/4/03 for Assault  
11 with a Dangerous Weapon and is prohibited from possessing  
12 firearms and ammunition that includes spent ammunition  
13 casings.

14 7. On 2/21/10, a Federal Search Warrant was served  
15 at the Jeffery Dolson residence on the Red Lake Indian  
16 Reservation. The Red Lake Police had secured the residence  
17 for a search warrant after the incident. A security sweep of  
18 the residence by Red Lake Police Officers was conducted.  
19 Officers noted spent ammunition casings inside the residence  
20 and the Glock firearm on the floor down the stairs from the  
21 front entry way.


22 8. During the search warrant, a Glock Model G23  
23 .40 caliber pistol (not made in Minnesota) with extended  
24 magazine was located on the floor down the stairs from the  
25 front entry way. Numerous .40 caliber shell casings were  
26 located in the residence an on the attached deck.

27 9. During booking of Dolson at the Red Lake Jail,  
28 RLPD Sergeant Dan Lyons heard Dolson making threats on

1 Officer Branchaud by saying in part words to the effect of,  
2 "I am going to put a cap in his ass" and "they can't hold me  
3 in here forever".

4 10. Based upon the above information, I believe  
5 probable cause exists that Jeffrey Lee Dolson possessed a  
6 firearm in violation of 18 U.S.C. §§ 922(g)(1). This  
7 affidavit does not contain all the information known about  
8 this incident, rather only enough to establish probable  
9 cause.

10 11. Further your affiant sayeth not.  
11

12   
13 Robert L. Mertz  
14 Special Agent  
Federal Bureau of Investigation  
Minneapolis, Minnesota

15 Subscribed and sworn to before me this 24th day of  
16 February, 2010.

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19 U.S. Magistrate Judge  
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